

USDC - Eastern District - WI

Plaintiff: Victor R. Brown

V.

Case #20-CV-319

Defendants: Daniel L. LaVoie; Jay VanLanen; Sue Peters; Justin Ribault; Jean Lutsey; Lucinda Buchannon; Rachael Matushak; Cassandra Baier; Cathy Francois; Drew Weyerker; Joshua Gomm; Triston Retzkeff; Alex Bonis; Ariles Arney; James Maher; David Yang; Colin Fruebrodt; Lori Alsum; Alan DeGroot; Brad Hompe; Cindy O'Donnell; John Kind; Michael Hoese; Dylan Radtke; Todd Hamilton; Emily Davidson; Tonia Rozmarynski; Larry Weber; Mary Leiser; Michael Glass; Lisa Doehling; Mr. Neveu; Mr. Gibbs; Mr. Cole; Mrs. Dr. Adams; Mr. Dr. Schmidt; Mr. S schueller; Mr. Swietakowski; ~~Mr.~~ John Doe (CO); John Doe (CO); John/Jane Doe; 2 John/Jane Does (vsc); John/Jane Doe (vcs); John Doe (MB); Green Bay Correctional Institution.

- In their Individual and Official capacities

42 USC 1983 AMENDED Complaint

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42 USC § 1983 Complaint

(A) Parties

① Plaintiff: USA Citizen; Resident of WI; Inmate of Columbia Corr. Inst. At times relevant to the complaint and the issues within it was housed @ the Green Bay Corr. Inst.

② Defendants - USA Citizens; Residents of WI. Employees of the DA

(B) Complaint:

Is written in "incidents" Numbering from 1 through 6 and shall be joined into one complaint in accordance w/ Fed. Rule Civ. Proc. 20

(C) Jury

I demand a Jury

(D) Jurisdiction

① Suing for a violation of Fed. law 28 USC § 1331

② Monell

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③ Claim - Incident one

- ① At all times following for claim incident one the date of incident was on or about 8/21/19 and the time was Approx 12:00 pm
- ② I was housed in the Green Bay Corr. Inst. at all times relevant to incident one.
- ③ In the RTHU Building cell 505 after an altercation with an officer, Supervisors Jay VanLanen and Drew Weycker were called to my cell.
- ④ When they arrived at my cell I had my window covered with a towel to completely obstruct their view.
- ⑤ Captain VanLanen knocked on my door but I ignored him as I was removing the Mirror from the wall.
- ⑥ LT. Weycker arrived at my cell while Capt VanLanen disengaged himself a few feet away.
- ⑦ There he spoke to various employees about the situation.
- ⑧ Meanwhile I conversed with Weycker and notified him that I had my mirror off the wall and banged it against the door and sink to prove it. Capt. VanLanen was in earshot and heard this. I know this because I

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(8) Claim incident 1 (8) continued
could see him out the crack of my door.

(9) They both did nothing other than attempt to talk me into taking the towel down and coming out so they could get the mirror.

(10) After I denied them to take the towel down and hand out the mirror, I started to swallow 6 pieces of metal and shove a 2 inch long screw in my ~~arm~~ left arm at the crook of my ~~elbow~~, left elbow.

(11) After I did all this I took the towel down and notified both Weycker and Capt Vanhook what I did; and I agreed for come out. ~~and I agreed for come out.~~

(12) When I came out handcuffed, I was then shackled with leg cuffs.

(13) For this officers Comm, Bonis, Nereu, Anne, Maher, Yang, Gibbs - and I believe Retelaff were present including Vanhook and Weycker.

(14) I was then placed, unresisting, into the "Strap down" chair where seatbelt like straps were crossed over my chest, lap and legs. My legs were first Velcro strapped to the chair, then ~~secured~~ my ankle chain was secured to that with a loop of sorts, then there was a seat belt strap like thing placed over that. All

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(E) claim incident 1 (14) continued

"clicked" into place.

(15) for this there was no immediate checking of the straps by a nurse. No checks at all until I later on got strapped down in the bed.

(16) At this time VanLanen told me "If you don't let the Dr. take the screw out of your arm, you are going to be strapped down" and I believe he said I would also get a ticket. - Which is a disciplinary action.

(17) When we arrived to HSD Nurse **Matushak** advised me that I would have to see Dr. Lavoie.

(18) They then "wheeled" me to a holding room and cuffed the strap down chair to a concrete slab and shut the metal door locking me inside.

(19) In this room I spoke to PSU. and told them about being threatened by VanLanen. I said I didn't want to be strapped down and this was the only reason I was going to comply with treatment. I didn't want to but felt I had no other choice because of VanLanen's threat and coercion, techniques.

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(E) Claim - incident one continued

(20) About 25 minutes later my arm was in serious pain from the screw and delayed treatment. And because of the multiple restraints my hips were in serious pain also.

(21) Dr. Daniel L. Lavoie arrived on unit then and I was escorted to the Rest. Housing Health care room in the chair.

(22) Once there my left arm was uncuffed and cuffed again to a teather about 12 inch long and my left hand was placed in a "Glove" which prevented any movement of my fingers. I also had a spit mask on - this entire time so far.

(23) I told the Dr. "I've been threatened and coerced into receiving treatment." Dr. Daniel L. Lavoie.

(24) Daniel Lavoie asked me, "Are you refusing?"

(25) I answered "No, I can't. I'm just letting you know."

(26) Daniel Lavoie then went into a back room to get some Metal tools.

(27) He then got down on one knee to my level so he could assess my injury.

(28) When he looked like he was about to start digging in my arm —

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(E) Claim incident one continued
(29) I asked him "Winoa, arent you going to use
anesthetics?"

(30) He replied "No."

(31) Immediately I felt something was amiss with
Daniel LaVoie and I felt my safety and life
was in danger.

(32) I then attempted to use self defense
techniques by headbutting Daniel LaVoie.

(33) However, I was restrained.

(34) Daniel LaVoie backed up and said "Well
maybe you deserve to be strapped down in the
bed."

(35) I was then moved and placed in Gripp
Bed Restraints. "Strap down bed."

(36) RN Matushak checked my Bed Restraints.

(37) At this point of the incident I was in severe
distress.

(38) Capt VanLanen then asked me if I "Would
consent to having the screw removed by Dr. Daniel
LaVoie."

(39) As it was my understanding that I was
only being strapped down in the bed because of
the screw in my arm and if I complied
I would be released I felt that I had

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(E) Claim incident one ~~continued~~ (39) continued
No other reasonable option but to consent so I
said to Capt VanLanen "Yes." Under severe Duress.

(40) Capt. VanLanen then asked Daniel LaVoie
when he arrived inside the room, if he could
keep his body camera recording throughout this
medical procedure.

(41) The Doctor, Daniel LaVoie stated "Yes."

(42) I was not asked and did not give my
consent to this.

(43) Daniel LaVoie gathered his metal tools and
~~at this time~~ at this time I told Daniel
LaVoie "I want you to use anesthesia."

(44) He answered "No. You stuck a screw in your
arm, not me, and this is a consequence of your
actions."

(45) He then started Jamming the metal's tools
in my arm causing me to bleed and causing me
extreme agony.

(46) I immediately started yelling at him "Stop!
I need a break. You're hurting me! Stop!"

(47) He said again "No, this is a consequence of
your actions, If you didn't want this, you should've
stuck a screw in your arm."

(48) I then heard a CO. say "He needs a

② claim incident one ④ cont...

Break stop." SGT. Tristan Metcliff

④ I again told Daniel Lavoie "^{that's} ~~stop~~ enough, stop!" but Daniel Lavoie continued jamming his tools in my arm causing more bleeding and even more pain pushing the screw inside deeper.

⑤ I attempted to move away by thrashing my body away from Daniel Lavoie but Capt. VanLanen ordered his staff to place their hands on me in which ~~Metcliff~~ Maher; Gomm; Metcliff; Weycker; Bonis; Fruebrodt; Neveu; Arne; Yang; GIBBS held me down ~~on the ground~~ ~~and despite my knowledge~~ ~~I was refusing~~ and stood by knowing I was refusing treatment and knowing that Daniel Lavoie was hurting me.

⑥ I continued to yell "I refuse you fucker, I refuse!" and struggle against staff in an attempt to get away from Lavoie. But still Lavoie continued jamming his tools in my arm causing more blood and pain. So much that I was reduced to screaming in agony.

⑦ Daniel Lavoie then stated to Capt. VanLanen "I thought he consented?" to which VanLanen responded "He did."

⑧ All this went on for approx 10-20 minutes.

⑨ I said again loud, clearly in a yelling voice "I refuse, I refuse, I refuse!"

⑩ At this time Capt VanLanen ordered Daniel Lavoie to disengage which he did so.

⑪ I requested from Dr. Lavoie for some effective pain treatment he answered "No" and left.

(2) claim 1 cont...

(57) I was left in the strap down bed for appx 4 hours before finally getting sent to the hospital.

(58) at appx 4 pm at St Vincents hospital, officers Wisniewski, 2 John Doe officers and LT. Cole were on escort with me to receive treatment for the above detailed incident.

(59) Health care personal assessed this injury and deemed it obvious that I required local anesthesia for the removal of the screw. For which the procedure was accomplished without pain and under 5 minutes.

(60) upon completion the healthcare staff deemed it necessary to close the wound with stitches but at this time CO Wisniewski told the Dr./Nurse "I don't want you to use stitches on Mr. Brown."

(61) The Dr./Nurse looked at him and asked "Why not?" to which CO Wisniewski stated "Because I believe he will just remove them."

(62) I then told the Dr./Nurse "No I won't, I want my arm to heal as fast as possible please do what you think you need to do not what this CO says who's not a medical professional."

(63) Wisniewski then ordered the Dr./Nurse "I'm ordering you not to use stitches because the prisoner will just remove them." He said this forcefully and in a threatening manner.

(64) I saw that the Dr./RN was intimidated and said "Ok I guess we can use steri strips but they won't be effective. Mr Brown if they come loose or off notify your facility and

Exclaim 1 (64) cont...

They will put new ones on.

(65) LT. Col. (Wisniewski's supervisor) just stood there without intervening as did the other 2 John Doe CO's.

(66) Back at the inst. 5 minutes later after being placed in my cell the steri strips came off because I was sweating so much in the heat so when I saw a nurse the next morning "Rachel Mafushak" she stated that orders from Daniel LaVoie were to leave the wound alone to heal with secondary intention, which basically meant refuse any treatment.

(67) As a direct result of this order my arm got infected twice to which I was refused any treatment because of Daniel LaVoie's order and my wound didn't heal until November.

(68) In the course of the investigation of Daniel LaVoie Lori Alsum ~~and~~; Alan DeGroot; Brad Hompe; and Cindy O'Donnell all falsified Reports saying that I "consented to care" and that Daniel LaVoie did not violate the standard of care or do anything wrong.

(69) Remedies Exhausted

• GBCI-2019-15194

• GBCI-2019-16096

• GBCI-2019-16714

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~~Incident three claim~~

~~Incident three claim~~

(F) Incident two claim

(1) The dates relevant to this incident are between 8/22/19 and 10/17/19 in the a.m.

(2) This incident involves Jean Lutsey; RTH, HSO Scheduling Employee for ~~prisoners~~ prisoners to see Health officials John/Jane Doe ~~and possibly other persons~~ ~~with~~ ~~discovery~~ Daniel LaVoie

(3) on three-five occasions I was notified by R.N. Maturak and R.N. Alsteen (not a defendant) on all these occasions that I was scheduled to see Daniel LaVoie for "Follow up" this was the pretense I was given.

(4) For the safety of my person and very possibly the safety of my life I was forced to refuse treatment from Daniel LaVoie. Jean Lutsey and Daniel LaVoie

(5) Several times I asked for Sue Peters to be scheduled to see me instead. I was refused.

(6) I was under intuitive impressions that this was done with some malicious reasoning mainly because when the RN's came to my door to notify me that I was to see Daniel LaVoie they came ready with "Refusal forms".

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(F) incident two claim - continued

(7) The refusal form I signed noting that I was in fear of my life and safety. ~~was~~

~~from~~ from Daniel Latic as the forms

(8) Remedies exhausted GBCI-2019-17887

(G) Incident three Claim

(1) This incident happened on two different dates. 10/10/18 through about 12/3/18. and 8/2/19 through 10/17/19

(2) This incident involved Dr. Hamilton, Dr. Adams, John Kind, Dr. Schmitt, Jay VanCarren, and possibly others unknown until Discovery

(3) The first incident was on/about 10/10/18 through ~~12/3/18~~, on/about 12/3/18.

(4) I was placed in a cell and housed there from on/about the above dates that lacked an emergency call button.

(5) So that in many incidents I was unable to properly, and in a timely fashion - to notify staff of my emergencies, which mainly turned out to be all self harm & self harm thoughts.

(6) I attempted to resolve the problem w/ all the above defendants (#2) and was refused a cell with an emergency call button.

(7) The next incident happened on/about 8/2/19

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⑥ Incident three claim ⑦ continued through on/about 10/17/19.

⑧ again I was placed in a cell that wasn't safe and had no emergency call button.

⑨ I tried to resolve the issue with Capt. VanLanen

⑩ However he refused to move me to a cell with an emergency call button.

⑪ Remedies exhausted.

⑫ GBCI-2018-24886

⑬ GBCI-2019-116420

⑭ As a result of this all ICRS employees A. Degroot; S. Schueller; E. Davidson; C. O'Donnell; M. Haese; B. Hompe are added as defendants to this claim by failing to take action to put me in a safe housing area when these issues were brought to their attention through the ICRS

⑮ Incident four claim

① This incident happened throughout the year of 2019 dating back from May through 10/17/19

② This incident involves ~~Donny~~ Rozmarynoski; Swietkowski; J. VanLanen; J. Kind; ~~Dr.~~ Radtke; Office of the secretary John/Jane Doe; Victim Services Coordinator John/Jane Doe; L. Webber;

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④ Fourth claim ② continued
Brooks;

③ These Defendants named did nothing to prevent inmate Jeffrey Scott's continuous sexual harassment towards me.

④ They in fact not only refused to separate us when this sex-harass- was brought to their attention, they put this inmate closer to me at recreation in retaliation for writing complaints about it.

⑤ And when they ever found my PREA Claims to be substantiated they still claimed there was no reason for us to be separated even though he was found guilty for sexual misconduct twice and multiple PREA claims found against ~~him~~ inmate Jeffrey Scott.

⑥ "They" is the above defendants.

⑦ I notified each of the above defendants of inmate Scott's sex-harass in writing and verbally and in investigative procedures. There was video recordings of his sex-harass- toward me even, still they did nothing.

⑧ I followed all policies and procedures in attempt to get us separated.

⑨ All the defendants denied me, saying there

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(8) ~~From~~ Claim (9) continued
"wasn't a problem" and that "I would just have to deal with" his sex-harass. "It's segregation what did I expect?"

(10) Weyerker; VanLanen and Rozmarynoski said variations of that.

(11) Of course I responded "Just because I'm in Seg doesn't mean I should have to put up w/ sex-harass - especially when there's a ready available remedy to the situation,

(12) I even filed a Prisoner Request for Separation DOC 1803

(13) John kind responded only "After Review" "Separation is not warranted"

(14) He knew about all the sex-harass - and that we were housed close together and still refused to take action.

(15) The Victim Services Coordinator at Cobei and CCI all refused to speak to me about this when I wrote them they wouldn't even report.

(16) Brooks refused to send me a Temporary Restraining order (petition) when I asked him multiple times instead always sending me the wrong forms. He knew about the sex-harassment cuz I told him.

(17) I wanna proceed with Retaliation

"Separation is not warranted" from John Kind

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(H) ~~False~~ incident claim (B) continued

claims & Deliberate Indifference claims against these defendants as well as possibly cruel and unusual punishment.

(I) Remedies exhausted: GBCI-2019-10770; DOC 1803; letters to victim services coordinators

(F) Incident ~~False~~ claim

(1) This incident involves CO Walton ^(M Leiser and M Colusso) and Capt. J. VanLanen; John Doe,

(2) I became aware of this incident on 10/14/20 while housed in AHH @ GBCI as property officer Walton came to my cell and told me that he and Capt. VanLanen has been withholding over 20 publications that came in the mail for me because they have staples in them.

(3) I asked him 2 questions:

"Why weren't the staples taken out and then given to me?"

"Why wasn't I provided with any type of notice?"

(4) Walton answered "Because policy states we cannot" and "That is not my dept. I don't know."

(5) It is Walton's job as a property officer to document all publications that come into the inst so he would be in charge of notification of non delivery of such publications

(6) It is J. VanLanen's job to supervise all AHH officers which Walton is. VanLanen has also taken the job of searching my property every so often to ensure I don't have contraband (ensuring my safety from self harm) so he would know from those searches that I had all

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③ continued ④ continued

These publications with staples in them. And he has asked me to stop ordering publications with staples in them because he doesn't want me to accidentally receive one which would put my safety in jeopardy as I could use the staples for self harm. So He definitely knew about these publications coming in and subsequently has to know that I'm not receiving them or any notice of non delivery.

⑤ Benedic's Exhausted CC-2019-19162 which was originally submitted on ~~10/13/79~~ 10/13/79 However M. Leiser and M. Glass prevented me from filing it by returning it to me several times unfilled.

① Incident ^{C. (SIX)} ~~eight~~ Claim

① This incident involves the following Defendants

Daniel Laroche, sue peters; Swiekutowski; Cummings; Jean Lutsey; Baler; Cathy Francis; Dr. Ribault; Buchannon; A. Degroot; L. Alsum; B. Hompe; C. O'Donnell; M. Glass; M. Leiser; L. Doehling

② And they have all denied me effective pain treatment.

③ Since approximately June 2017 through current date 2020 I have sought effective pain treatment from the above defendants.

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① & continued

④ Sue Peters, Daniel Lavoie and Justin Ribault are all medical personnel with medication prescribing abilities.

⑤ on every opportunity that I saw them I've sought a prescription for the nerve pain in my arms and my bunion pain. I've told them on each of these occasions that Tylenol, Ibuprofen, Naproxen do not work and daily intake of them is probably doing more harm than good.

⑥ Despite this they would either increase the dose or tell me that this is all they will give me. They also told me that I have to try certain medications before they can even prescribe anything stronger.

⑦ Daniel Lavoie is the only one who refused to prescribe any pain medication for me at all.

⑧ Sue Peters prescribed me Duloxetine which I tried and told her was not working. Despite this she continued the prescription until I moved to Justin Ribault's care and I told him it wasn't working which he did nothing about.

⑨ because of this I started refusing the medication.

⑩ Since this Ribault has continued to both refuse me any pain medication and prescribe me ineffective pain medications.

⑪ Even when Hospital Dr's with much higher credentials than Ribault have prescribed me Gabapentin which is effective and told me that my need for something like Gabapentin and my pain is obvious and he doesn't know why I'm not on it already, Dr. Ribault

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① & claim ⑪ continued

has seemingly maliciously discontinued those prescriptions despite knowing that it helps me and there's no chance for abuse in my housing

⑫ Peters, Lavoie and Ribault have all refused to provide me with effective pain treatment

⑬ Jean Lutsey and Lucinda Buchanan are both Health services managers in charge of overseeing Peters, Lavoie and Ribault and so when I brought the issue up to their attention of them not providing me with effective pain treatment they took absolutely no action despite knowledge of the issue. I know they know about the issue because I have responses from them showing that they received my letters asking them to help me get pain treatment.

⑭ A. DeGroot; L Alsom; B. Horne; C. O'Donnell; M. Gloss M. Leiser; L. Doehling are all members of the ICRS (Inmate Complaint Review system) and each of these members had the opportunity to help provide me with effective pain treatment when I brought the issue to their attention through the use of the ICRS they could have ~~not~~ properly investigated my issue and affirmed my complaint requiring medical personnel to provide me with effective pain treatment. Despite this they did not.

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(K) ~~1~~ Constitutional Violations claimed for each incident and reasons why.

(1) Incident one claim

(a) Defendants ~~David Brown~~ Jay VanLone and Drew Weylker:

Deliberate Indifference to my serious medical needs:

Both Defendants knew I had my mirror off of the wall and subsequently had a lot of metal which undoubtedly did bring up the concern that I would harm myself with that metal. They knew or should've known this due to my extensive self harm history in which both defendants were aware of from their daily dealings with me. - I suffered severe injury - screw in arm.

(b) Defendants Rochael Matushak

cruel and unusual punishment or treatment: Deliberate Indifference

Defendant knew I was being strapped down in the chair restraints and knew failure to check those restraints should something be wrong could result in medical problems that could be a serious danger to my health. Despite this knowledge she failed and refused to check my straps while in the chair. I suffered risk of injury.

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① Defendants Jay VanLanen

cruel and unusual punishment;

Defendant knew that threats and coercion to receive medical treatment was malicious and beyond the means of anything remotely socially acceptable - Injury suffered forced treatment.

② Defendant Daniel Lohore;

cruel and unusual punishment and treatment;

Deliberate Indifference; Retaliation; Criminal Negligence; Criminal Assault and battery; Crime against humanity

Defendant knew that I was being threatened and coerced into receiving treatment, but treated me anyway.

Defendant retaliated on me showing anger at my self harm actions by refusing me anesthesia for a very painful procedure Defendant was not qualified to perform anyway; continually retaliated on me for attempting to head butt him by telling me I "deserve" to be strapped down; treating me when I refused further treatment and causing me extreme agony. Telling me that the pain

P- 2A of 3A no reverse

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(R) Constitutional Rights Violations - each incident (D) continued

"was a consequence" of my self harm and if I "didn't want" it I shouldn't've self harmed. Defendant did this with obvious malicious intent. Defendant Torched me. Then denied me effective pain treatment for my excruciating agony.

(C) Defendant Jay Vankanen

Cruel and unusual punishment and treatment;
Assault and battery; Deliberate Indifference;
Crimes against humanity; failure to protect.

Defendant ~~ordered~~ officers under his control to hold me down so Daniell LaVoie could torture me against my consent for treatment and encouraged LaVoie's actions by insisting I consented even when I verbally refused loud and clear multiple times. Defendant knew this but disregarded And took measures to worsen the situation.

(F) Defendants Gomm; Ketzlaff; Bonis; Neveu; Arne; Maher; Yong; Gibbs; Matushak

Deliberate Indifference; Failure to protect

23 ~~of~~ of 31 no reverse

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(1) Const. Violations

(1) cont.,

Although I don't blame these defendants personally because they seemingly were intimidated by VanLanen ~~is~~ They still could've stopped LaVoie from basically torturing me.

(2) Incident two claim

↓ Jean Lutsey; John/Jane Doe; Daniel LaVoie

- Failure to protect

These defendants put me at severe risk of harm (knowing about what happened previously with Daniel LaVoie) by continuing to schedule me to see him even though my ~~the~~ regular Doctor was see Peters and ~~they were~~ ~~nothing~~ This caused me more injury when I could not see LaVoie for my cuts due to the risk of him injuring me more than he did already. I had legitimate fear and reason to believe he would continue to try and hurt me from our previous encounters. And LaVoie was wrong not to remove himself from trying to see me. He wanted to see me solely to hurt me again.

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Constitutional Violations - continued

③ Incident three (e) claim

Defendants Dr. Adams; Dr. Schmidt; Dr. Hamilton; Jay VanLanen and John Kind.

- Deliberate Indifference to my serious medical needs and failing to protect; Due process violation.

- As a prisoner on a Behavioral Management plan, it is the decision of all the above defendants to choose where to house me and why. Defendants knew of my tendencies to severely self harm and [even if I don't tell someone before hand] I will

~~use~~ use the emergency call button to notify officials immediately afterwards to receive treatment. Placing me in a cell without an emergency call button effectively prevented me from notifying officials of my self harm and suicidal thoughts so that I could not effectively receive immediate treatment.

And even after I had harmed myself multiple times in this cell [without an emergency call button and requested in writing to each defendant and verbally multiple times to Jay VanLanen] All defendants still refused to move me even though they know the risks of harm to myself outweighed any security concerns that they claimed. To which their claims that I damage emergency call buttons were false anyway. They failed to protect me from the risk of harm and further harm by failing to safely house me in a cell where I could notify officials immediately of my emergencies and denied

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(K) Constitutional Violations (S) continued

me due process when I notified them of the issue and they failed and refused to ~~not~~ bring the issue to my Behavioral Management Plan meetings. Housing me in a cell with an emergency call button would have better enabled the defendants to protect me from self harm as I often notify officials via emergency call button of my desires to self harm.

Defendants Degroot, Schuttler, Davidson, O'Donnell also failed to protect me by not taking actions appropriate to my need of risk when the issue was brought to their attention in the Inmate Complaint Review System. (ICRS)

(L) Incident Four Claim

Defendants; Rozmarynoski; Swietkowski; Jay Vanlanen; John Kind; Dylan Radtke; OOS John/Jane Doe; Victim Services Coordinator John/Jane Doe

- Deliberate Indifference; Failure to Protect; Violation of the Federal PREA standard. Cruel and Unusual Punishment

I made ^{multiple} PREA claims against another inmate - They refused to separate us. As a result this inmate was put next to me and allowed to sexually harass me for months on end. Ever after my claims were substantiated and ^{multiple} disciplinary actions were taken against the inmate and I filed a Request for separation - ~~the~~ inmate and I were not separated. Defendants violated the Fed. PREA standard and failed to protect me when

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(K) const. violations

(6) incident 6 ~~claim~~ Claim

Defendants; Danielle LaVoie; Sue Peters; Justin Ribault; Jean Lutsey; Lucinda Buchannon; Cassandra Baier; Cathy Francios; Swickatowski; S. Cummings; M. Tallier; A Dekroot L. Alsum; B. Horpe; C. O'Donnell; M. Leiter; M. Glass; L. Doehling
Deliberate Indifference to my serious medical needs

All defendants have denied me effective pain treatment throughout my incarceration. Each defendant was notified of my significant pain of current and past medications being ineffective in person or in writing and still refused to take action that would permit me to receive effective pain treatment.

(7) Defendants Not Mentioned above

(A) Radtke, Haese, John. Kind all knew about the incident with Daniell LaVoie on 8/21/19 because the investigators Wickman and Cummings told them despite this knowledge ~~some~~ all 5 defendants above failed to prevent further contact with Daniel LaVoie risking further injury upon me creating my inability to be medically treated for two months.

(B) Radtke, Haese and two John Does all knew about Jeffrey Scotts sexual harassment toward me from ~~plaint~~ reports and Filings through the ICRS

(C) L. Weber, refused to report Jeffrey Scotts sexual Harassment against me even though he did it right in front of him.

— Remedies Exhausted —

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(1983) Continued

① Relief Requested

① Monetary Damages

② Actual Damages:

• Physical and Mental Suffering: 1 Googol American dollars [a 'Googol' has one hundred zero's]

• Out of pocket expenses: To be determined

③ Nominal Damages: \$1

④ Punitive Damages: 1 Googol American Dollars

② Equitable Relief

② Charges of Assault and battery brought against Daniel LaVoie and Capt Jay Karlson

③ Five Defendants:

Daniel LaVoie; Jay Karlson; Sue Peters; Justin Ribault;
Rechael Matushak; John Doe Wisniewski; John Doe
Cole; Jane Doe Rozmarynoski; Mr. Glass; M.
Leiser; ~~William~~

- from the Doc/DAI

③ All my current criminal charges dropped,

④ Expunge my Criminal History,

⑤ Release me from imprisonment,

P- 29 of 31 see reverse

③ Injunctive Relief

Ⓐ Removal of staples from all publications
for all ~~prisoner~~ ~~prisoners~~ Restrictive housing
units in All Dept. of Adult Inst.

Ⓑ Do not deny prisoners publications just
because they ~~do not~~ have staples in them.

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I swear that the foregoing is True to the
best of my knowledge. I swear this under
penalty of perjury with my signature below.

Signed sincerely and forever in virtue on
this 9 day of August 2020

Kids of Masterbankers

Do Ed Masterbankers

P- 31 of 31 (end)